

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: : CHAPTER 13
CARLOS R. CAPA, :
a/k/a CARLOS CAPA, : CASE NO. 5:22-bk-01191
a/k/a CARLOS RENE CAPA, :
Debtor. :
=====

JACK N. ZAHAROPOULOS, Trustee :
Movant : MOTION TO DISMISS
v. :
CARLOS R. CAPA, :
a/k/a CARLOS CAPA, :
a/k/a CARLOS RENE CAPA, :
Respondent. :

STIPULATION TO RESOLVE TRUSTEE' MOTION TO DISMISS

AND NOW, this 7th day of November, 2022, Debtor(s) Carlos R. Capa, and Jack N. Zaharopoulos, Standing Chapter 13 Trustee, do hereby stipulate that Debtor(s) elect the following in satisfaction of the Trustee's Motion to Dismiss due to delinquent plan payments:

1. CURE DEFAULT: (CHECK ONE)

- ☐ Move to convert to Chapter 7 within 5 days from the date of this stipulation.
- ☐ Move to voluntarily dismiss case within 5 days from the date of this stipulation.
- ☒ Amend the Plan within 30 days from the date of this stipulation.
- ☐ Pay the arrears within ____ days (may not exceed 90 days) from the date of this stipulation.

2. WAGE ATTACHMENT: (CHECK ONE)

- ☐ Within 30 days from the date of this stipulation, Debtor(s) will file a Motion for wage attachment for payment of the regular monthly payments to the Trustee.
- ☒ Debtor(s) is unable to make payments by wage attachment because (be specific) he is a self-employed taxi driver.
- ☐ Already wage attached, and will amend if necessary.

3. FUTURE PAYMENTS:

IT IS STIPULATED THAT BEGINNING WITH THE PAYMENT DUE IN THE MONTH OF NOVEMBER, 2022, DEBTOR(S) WILL MAKE ALL REGULAR MONTHLY PAYMENTS TO THE TRUSTEE DURING THE REMAINING TERM OF THE PLAN.

4. DEFAULT:

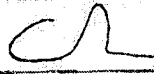
IN THE EVENT THE DEBTORS DO NOT PERFORM ACCORDING TO THIS STIPULATION, THE CASE MAY BE DISMISSED UPON CERTIFICATION OF THE TRUSTEE, WITHOUT FURTHER NOTICE TO PARTIES OR FURTHER HEARING.

Jack N. Zaharopoulos, Trustee

JACK N. ZAHAROPOULOS, Trustee



VINCENT RUBINO, Attorney for Debtor



CARLOS R. CAPA, Debtor